

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

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UNITED STATES OF AMERICA)

v.)

Case No. 2:23-cr-00067

VICTOR FRANCISCO LOPEZ-PADILLA,)

SIMON JACINTO-RAMOS, and)

JHON REINA-PEREZ,)

Defendants.)

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count One

Beginning on a date unknown to the Grand Jury, but at least as early as April 2022, and continuing until at least August 22, 2023, in the District of Vermont and elsewhere, defendants VICTOR FRANCISCO LOPEZ-PADILLA, SIMON JACINTO-RAMOS, and JHON REINA-PEREZ knowingly and intentionally agreed and conspired with one another and with other individuals known and unknown to the grand jury to transport and move individuals—whom the defendants knew to be, or recklessly disregarded were, aliens who had come to and entered the United States in violation of law—within the United States by means of transportation or otherwise in furtherance of the aliens' illegal entry.

(8 U.S.C. §§ 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(i))

Count Two

On or about June 8, 2023, in the District of Vermont, defendants VICTOR FRANCISCO LOPEZ-PADILLA and SIMON JACINTO-RAMOS, knowing and in reckless disregard of the fact that H.P.J.—an alien to the United States—had not received prior official authorization to come to, enter, and reside in the United States, knowingly brought H.P.J. to the United States from Canada for the purpose of commercial advantage and private financial gain.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)


Count Three

On or about July 26, 2023, in the District of Vermont, defendants JHON REINA-PEREZ and SIMON JACINTO-RAMOS, knowing and in reckless disregard of the fact that C.V.C.—an alien to the United States—had not received prior official authorization to come to, enter, and reside in the United States, knowingly brought C.V.C. to the United States from Canada for the purpose of commercial advantage and private financial gain.

(8 U.S.C. § 1324(a)(2)(B)(ii); 18 U.S.C. § 2)

TRUE BILL


FOREPERSON


NIKOLAS P. KEREST (MJL)
United States Attorney
Burlington, Vermont
October 3, 2023